



Courtesy Copy

1540 Broadway  
23rd Floor  
New York, NY 10036  
  
646.927.5500 main  
646.927.5599 fax

Hon. Judge John. G. Koeltl  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Copy to counsel on record for defendant via e-mail and U.S. mail.

Re: *Eastern Profit Corporation Limited v. Strategic Vision US LLC*, Civil Action  
No. 18-CV-2185, Joint Motion to Stay Further Proceedings on Defendant's  
Motion to Unseal

Dear Judge Koeltl,

Pursuant to Rule 7.1(d) of the Local Rules of this Court, Plaintiff Eastern Profit Corporation Limited ("Eastern Profit") and Defendant Strategic Vision US LLC ("Strategic Vision") (collectively "the Parties") hereby respectfully request the Court to continue to stay further proceedings, including any response, on Defendant Strategic Vision's motion to unseal this action filed on April 3, 2018 ("Motion to Unseal") until May 11, 2018.

As grounds for the stay, the Parties state as follows:

On April 3, 2018, Defendant filed a motion to unseal this action (the "Motion to Unseal"). After Defendant filed its Motion to Unseal, the Parties conferred and agreed to negotiate the terms of a stipulated protective order that will allow this action to be unsealed, but will require certain particular information to remain confidential.

Because the stipulated protective order will render Defendant's Motion to Unseal moot, on April 20, 2018, the Parties filed a letter-motion requesting that this Court stay further proceedings on the Motion to Unseal to allow them time to negotiate the terms of the protective order. The Parties' letter-motion anticipated that negotiations would be finished by today, April 27, 2018. The Parties have conferred regarding the terms of the stipulated protective order, but require additional time to conclude their negotiations. For these reasons, the Parties respectfully request that the Court continue to stay any further proceedings on Defendant's Motion to Unseal until they have concluded negotiations regarding the terms of the stipulated protective order, which they expect to occur by May 11, 2018.

Respectfully submitted this 27<sup>th</sup> day of April, 2018.

ATTORNEYS AT LAW

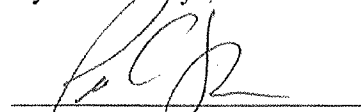
BOSTON | NEW YORK | PARIS | WASHINGTON | FOLEYHOAG.COM

*Under Seal*  
*Application*  
*granted. The parties*  
*should advise the Court*  
*promptly on the*  
*status of this case.*  
*So ordered*

*5/2/18*  
*J. G. Koeltl*  
*U.S.D.J.*

EASTERN PROFIT CORPORATION LIMITED,

By its attorneys,

A handwritten signature in black ink, appearing to be "P. Sullivan", is written over a horizontal line.

Peter A. Sullivan, Esq.

Shrutih V. Ramlochan-Tewarie, Esq. (*pro hac vice*  
*application to be submitted*)

FOLEY HOAG LLP

1540 Broadway, 23rd Floor

New York, NY 10036

psullivan@foleyhoag.com

stewarie@foleyhoag.com

Telephone: (646) 927-5500

Facsimile: (646) 927-5599

DATE: APRIL 27, 2018